

**Deposition Designations for:  
JACK D. KENWORTHY  
December 17, 1999**

**Deposition Designation Key**

**Arrowood = Arrowood Indem. Co.  
f/k/a Royal Indem. Co. (Light Green)**

**BNSF = BNSF Railway Co. (Pink)**

**Certain Plan Objectors "CPO" = Government Employees Insurance Co.; Republic Insurance Co.  
n/k/a Starr Indemnity and Liability Co.; OneBeacon America Insurance Co.; Seaton Insurance  
Co.; Fireman's Fund Insurance Co.; Allianz S.p.A. f/k/a Riunione Adriatica Di Sicurtà; and Allianz  
SE f/k/a Allianz Aktiengesellschaft; Maryland Casualty Co.; Zurich Insurance Co.; and Zurich  
International (Bermuda) Ltd.; Continental Casualty Co. and Continental Insurance Co. and  
related subsidiaries and affiliates; Federal Insurance Co.; and AXA Belgium as successor to Royal  
Belge SA (Orange)**

**CNA = Continental Cas. Co & Continental Ins. Co. (Red)**

**FFIC = Fireman Funds Ins. Co. (Green)**

**FFIC SC = Fireman Funds Ins. Co. "Surety Claims" (Green)**

**GR = Government Employees Ins. Co.; Republic Ins. Co. n/k/a Starr Indemnity and Liability Co.**

**Libby = Libby Claimants (Black)**

**OBS = OneBeacon America Ins. Co. and Seaton Ins. Co. (Brown)**

**PP = Plan Proponents (Blue)**

**Montana = State of Montana (Magenta)**

**Travelers = Travelers Cas. and Surety Cos. (Purple)**

**UCC & BLG = Unsecured Creditors' Committee & Bank Lenders Group (Lavender)**

**AFNE = Assume Fact Not in  
Evidence  
AO = Attorney Objection  
BE = Best Evidence  
Cum. = Cumulative  
Ctr = Counter Designation  
Ctr-Ctr = Counter-Counter  
ET = Expert Testimony  
F = Foundation  
408 = Violation of FRE 408  
H = Hearsay  
IH - Incomplete Hypothetical**

**L = Leading  
LA = Legal Argument  
LC = Legal Conclusion  
LPK - Lacks Personal Knowledge  
LO = Seeking Legal Opinion  
NT = Not Testimony  
Obj: = Objection  
R = Relevance  
S = Speculative  
UP = Unfairly Prejudicial under Rule 403  
V = Vague**

MONTANA NINETEENTH JUDICIAL DISTRICT COURT  
LINCOLN COUNTY

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JACK D. KENWORTHY and )  
PATRICIA HELEN KENWORTHY, )  
husand and wife, )  
Plaintiffs, )  
-vs- ) No. DV-99-185  
W.R. GRACE & CO.-CONN, a Connecticut )  
corporation, W.R. Grace & CO, a Delaware )  
corporation W.R. GRACE & CO., a/k/a GRACE, )  
a association of business entities, BENITA P. )  
LOVICK, Personal Representative for the )  
ESTATE OF EARL D. LOVICK, DECEASED, )  
and DOES I-I )  
Defendants, )  
)

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VIDEO DEPOSITION OF JACK D. KENWORTHY

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Heard at 3000 Villard 135-A  
Helena, Montana  
December 17, 1999  
1:00 p.m.

A large, dark, horizontal redaction mark, likely a signature, is centered on the page below the hearing details.

PREPARED BY:

Copy

THERESA A. STRAUCH, RMR  
HENDRICKSON COURT REPORTING  
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Helena, Montana 59601  
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## VIDEO DEPOSITION OF JACK D. KENWORTHY / DECEMBER 17, 1999

<p>PAGE 1</p> <p>MONTANA NINETEENTH JUDICIAL DISTRICT COURT LINCOLN COUNTY</p> <p>JACK D. KENWORTHY and PATRICIA HELEN KENWORTHY, husband and wife, Plaintiffs,</p> <p>-vs-</p> <p>W.R. GRACE &amp; CO.-CONN, a Connecticut corporation, W.R. GRACE &amp; CO., a Delaware corporation W.R. GRACE &amp; CO., a/k/a GRACE, an association of business entities, BENITA P. LOVICK, Personal Representative for the ESTATE OF EARL D. LOVICK, DECEASED, and DOES I-IV, Defendants.</p> <p>VIDEO DEPOSITION OF JACK D. KENWORTHY</p> <p>BE IT REMEMBERED, that the video deposition upon oral examination of JACK D. KENWORTHY, appearing at the instance of Plaintiff, was heard at 3000 Villard, 135-A, Helena, Montana, on the 17th of December, 1999, beginning at the hour of 1:00 p.m., pursuant to the Montana Rules of Civil Procedure before Theresa A. Strauch, Notary Public.</p> <p>* * * * *</p>	<p>PAGE 3</p> <p>I N D E X</p> <p>EXAMINATION:</p> <p>By Mr. McGarvey 4-47</p> <p>By Mr. MacDonald 29-50</p> <p>EXHIBITS:</p> <p>*** NO EXHIBITS MARKED ***</p> <p>WORD INDEX AT END OF TRANSCRIPT ***</p>
<p>PAGE 2</p> <p>A P P E A R A N C E S</p> <p>ATTORNEY APPEARING ON BEHALF OF THE PLAINTIFF:</p> <p>ALLAN M. MCGARVEY Attorney at Law McGarvey, Heberling, Sullivan &amp; McGarvey 745 South Main Kalispell, Montana 59901</p> <p>ATTORNEY APPEARING ON BEHALF OF THE DEFENDANTS:</p> <p>TERRY L. MACDONALD Attorney at Law Garlington, Lohn &amp; Robinson P.O. Box 7909 Missoula, Montana 59807-7909</p> <p>Libby [redacted]</p>	<p>PAGE 4</p> <p>WHEREUPON, the following proceedings were had and testimony taken, to-wit:</p> <p>VIDEOPHOTOGRAPHER: We're now going on the record. It's December 17, 1999, approximately 1:01 p.m.</p> <p>*****</p> <p>(Witness sworn)</p> <p>JACK D. KENWORTHY, called as a witness herein, having been first duly sworn, was examined and testified as follows:</p> <p>EXAMINATION</p> <p>BY MR. MCGARVEY:</p> <p>Q. Please state your name. A. Jack D. Kenworthy.</p> <p>Q. Jack, are we taking this deposition at your daughter's home in Helena? A. Yes, we are.</p> <p>Q. And have you moved to Helena to be near your family since you got sick? A. Yes, I have.</p> <p>Q. Jack, tell us what you're sick with. A. I was diagnosed with lung cancer.</p>

## VIDEO DEPOSITION OF JACK D. KENWORTHY / DECEMBER 17, 1999

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1 Q. And are you suffering any ill effects of 2 that today? 3 A. Yes. 4 Q. Okay. Can you tell me about that, how 5 you're feeling? 6 A. Well, I've lost about 40 pounds or more 7 and just weak and can't do anything. 8 Q. How do you -- as far as remembering 9 things, do you have any difficulty with 10 remembering? 11 A. Yes. 12 Q. Okay. 13 A. My memory's not very good. 14 Q. And are you taking any treatment for the 15 cancer? 16 A. Yes, I'm taking chemotherapy, and I'm 17 taking radiation. 18 Q. And the chemotherapy, does that tire you 19 out? 20 A. It seems to, yes. 21 Q. And then in addition to that, are you 22 taking medications? 23 A. Yes, I am. 24 Q. And did I have you sit down with your wife 25 and make a list of those for me?	1 A. Cancer in the stomach and the -- go on. 2 Q. Okay. Jack, do you have a hard time 3 recalling words? 4 A. Yes. 5 Q. Okay. And is that since you got the 6 cancer? 7 A. (Witness nods head.) Yes. 8 Q. Do you find yourself being confused? 9 A. Yes, very easily. 10 Q. And just the other day we went through a 11 deposition process. Can you describe how that was 12 for you as far as how well you recalled things or 13 were able to do that without tiring out? 14 A. What was that again? 15 Q. When we did your deposition the other day, 16 was that hard? 17 A. Yes. 18 Q. Okay. Then you also have Prednisone. You 19 take that for the glands? 20 A. Yeah. 21 Q. And then I think it's Megace, M-e-g-a-c-e, 22 for your appetite? 23 A. Yeah. 24 Q. You have difficulty with your appetite? 25 A. Yeah.
PAGE 6	PAGE 8
1 A. Yes, I did. 2 Q. I just want to run through those. The 3 first one that you've got here is Duragesic patch 4 for pain? 5 A. Yes. 6 Q. Are you wearing that now? 7 A. Yes, I am. 8 Q. And then Percoset, have you taken that 9 within the last 24 hours? 10 A. No, I haven't. That's for pain. 11 Q. Okay. Did you have any of that yesterday 12 or last night? 13 A. Yesterday.	1 Q. And you take these every day? 2 A. I take this one, yes, appetite medicine 3 every day, yes. 4 Q. Okay. Now, between the effects of the 5 cancer and the chemotherapy and these different 6 medications, is that affecting how you're able to 7 understand and communicate here today? 8 A. Yes. 9 Q. And I'll try to keep this short, Jack, and 10 I apologize I have to ask questions and try not to 11 ask them in a leading form. So it's not that I'm 12 picking on you. It's just the way I have to try to 13 ask these questions. 14 When did you first go to work at Grace? 15 A. 1968. 16 Q. When you first went to work there, what 17 did the company tell you if anything about 18 workplace hazards? 19 A. Not very much, nothing. 20 Q. Anything that you can recall? 21 A. No hazards. 22 Q. Was it dusty up at Grace where you worked 23 there? 24 A. Just the -- yeah, a dust, but it wasn't 25 hazardous. It was just a nuisance dust more or
14 Libby	

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<p>PAGE 9 1 less. 2 Q. Okay. Were you told it was a nuisance 3 dust? 4 A. Yes. 5 Q. Describe the dust. What did you see in 6 the air? 7 A. Well, I see a light sometimes a film of 8 gray dust coming down. 9 Q. Was it always the same? 10 A. Pretty much all the same. 11 Q. Okay. Were there places that were dustier 12 than others? 13 A. Oh, yeah, lots of places. 14 Q. Were there times that were dustier than 15 other times? 16 A. Yes. 17 Q. Jack, I'm showing you Exhibit 222, Common 18 Exhibit 222. Do you recognize that being up at the 19 mill and how it looked at the time that you worked 20 there? 21 A. Yes. 22 Q. And is that the mill that we see in the 23 lower right of that photo? 24 A. It appears to be, yes. 25 Q. And in that photograph, we can see some</p>	<p>PAGE 11 1 of the jobs that you did at Grace? 2 A. Yes. 3 Q. And I had that typed up, and does 4 Plaintiff's Exhibit 520-JK, does that accurately 5 list the jobs that you held to the best of your 6 recollection when you worked at Grace? 7 A. Yes, it does. 8 Q. And I want to kind of work through that a 9 little bit. At the beginning there, in 1968, it 10 says you worked in the construction department. 11 Can you tell us what kind of jobs you did when you 12 were there? 13 A. Well, you went around and built different 14 things, made different things for the mining 15 operation, worked in the dry mill. I worked at the 16 lower ore bins, here and there. 17 Q. Describe what it was like inside the dry 18 mill: 19 A. At times it could be pretty dusty, dirty. 20 Q. And what kinds of things were going on 21 when it was real dusty there? 22 A. Well, the mill was running of course and 23 stirring up dust and guys blowing down, sweeping. 24 Q. When you say blowing down, what were they 25 blowing down?</p>
<p>PAGE 10 1 haze in the area of the mill. Was that common when 2 you worked up there? 3 A. No, it was not. 4 Q. Okay. How often would it be hazy and 5 dusty around the mill like that? 6 A. Well, I don't know. It would vary from 7 day to day, but it could be like that for a day or 8 two, I suppose, and then it would clear up. The 9 wind would come through and take it on out. 10 Q. Jack, you said that you were told that the 11 dust was a nuisance dust. What did you understand 12 that to mean? 13 A. That it wasn't harmful. 14 Q. When you first went to work at the 15 company, Jack, did they tell you that there was 16 tremolite in the dust? 17 A. No. 18 Q. Did they tell you that there was asbestos 19 in the dust? 20 A. No. 21 Q. Did you know, Jack, from any source that 22 there was tremolite or asbestos when you went to 23 work up there? 24 A. No. 25 Q. Jack, did I ask you to make a list for me</p>	<p>PAGE 12 1 A. Walls and pipes and things along the walls 2 and so forth. 3 Q. What were they blowing it down with? 4 A. Air. 5 Q. What were they blowing off? 6 A. Dust. 7 Q. How much dust? 8 A. Well, it depends on when it was cleaned 9 last, but sometimes it could be quite a bit, 10 sometimes not too much. 11 Q. And then it would get blown down onto the 12 floor? 13 A. Floor. 14 Q. And then what would they do with that? 15 A. I'd sweep it up. 16 Q. Okay. Jack, I'm showing you Plaintiff's 17 Exhibit 288. Do you recognize where that's at? 18 A. I believe it's at the lower ore bins. 19 Q. Okay. Down by the river? 20 A. Yes. 21 Q. Can you tell us, by way of comparison, if 22 we look here at the bottom of these beams, we see 23 kind of piles, and we can see kind of a track 24 through the dust there. How would that compare to 25 conditions in the dry mill when they were blowing</p>

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1 it down and sweeping?  
2 A. This would be a lot worse.  
3 Q. Okay. So it wasn't that bad as far as the  
4 amount of stuff they were sweeping up?  
5 A. No.  
6 Q. Were you ever in this part of the lower  
7 bins where all this dust is that we see here on  
8 288?  
9 A. Yes, I was down there once.  
10 Q. Now, when you were down at the lower ore  
11 bins, where did you usually work?  
12 A. Down in the loading facility part of it.  
13 Q. And I want to show you Exhibit 134. Is  
14 that the lower ore bins that you're talking about?  
15 A. Yes.  
16 Q. Okay. And what did you do when you were  
17 down there?  
18 A. Loaded ore into the cars for shipping.  
19 Q. Describe how that's done.  
20 A. Well, the ore comes out from under the  
21 bins onto that conveyor going across the river and  
22 dumps into the ore cars.  
23 Q. And how would it be transferred onto the  
24 conveyor?  
25 A. Just a gravity fall more or less.

Libby

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1 Q. What else did you do down there at the  
2 lower storage bins down by the river?  
3 A. I don't remember.  
4 Q. How does the ore get out of those bins to  
5 be conveyed across the river?  
6 A. How did the ore get out of the bins?  
7 Q. Yes, you talked about a gravity system.  
8 Where does it pour down to?  
9 A. Well, there must have been a gate of some  
10 sort, I don't remember exactly, that you opened  
11 and --  
12 Q. The gate opened, and then it went down?  
13 A. Yeah.  
14 Q. Down to where?  
15 A. To the conveyor, whichever conveyor you  
16 were shipping out on. Those five tanks, they may  
17 be different grade ore. Like they had one, two,  
18 three, four and five grade ore, you know.  
19 Q. So you could open a different gate for  
20 each of those tanks?  
21 A. Right.  
22 Q. And then underneath that then was there a  
23 tunnel?  
24 A. Yeah, a tunnel and a conveyor.  
25 Q. Okay. And did you ever work down there?

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1 Q. Oh, I see. Okay. Well, what operations  
2 did you do?  
3 A. Sometimes we run that little Cat end  
4 loader, and it might take it --  
5 Q. Is that like a front-end load?  
6 A. Yeah, Cat end loader.  
7 Q. And what would you do with that?  
8 A. Pick up the ore and maybe move it out of  
9 this bin into this bin for shipping because maybe  
10 this bin was empty or they wanted to blend these  
11 two together. Sometimes they did that.  
12 Q. And would you dump the ore from one pile  
13 to another?  
14 A. Right.  
15 Q. What was the condition of the ore at that  
16 time? Was it wet or dry?  
17 A. Oh, no, it was always dry. This is known  
18 as a dry facility down here.  
19 Q. Okay. And when you dumped that, did that  
20 create any dust?  
21 A. Yes.  
22 Q. Can you describe that at all?  
23 A. Well, you know, when you pick up a shovel  
24 full of dry dirt and flip it over, dust will fall  
25 out, you know, and that's what it was.

Libby

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1 A. Yeah, down here.  
2 Q. And describe that. What was it like down  
3 in the tunnel?  
4 A. It would be pretty dusty down there. If  
5 one of these chutes up here plug up, one of the  
6 chutes under the tank plug up, then you get in  
7 there and prod it out of there until it's clear.  
8 Q. Prod it with what?  
9 A. Steel rods or anything.  
10 Q. Can you describe the dust conditions when  
11 you were doing something like that?  
12 A. It's pretty bad, real bad.  
13 Q. Okay. Jack, I want to move to the next  
14 job after you left the construction department.  
15 Where did you go next?  
16 A. Welding shop.  
17 Q. Where did you go in 1970 before the  
18 welding shop?  
19 A. Oh, the garage.  
20 Q. Okay. And what did you do in the garage?  
21 A. Service mechanic.  
22 Q. And what does that entail? What does a  
23 service mechanic do?  
24 A. Works on trucks, the equipment.  
25 Q. Regular mechanical kind of work like you

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- 1 would see in a --  
2 A. Right, regular mechanical work.  
3 Q. Work on the engines?  
4 A. Engine, wiring, whatever, tires, so  
5 forth.  
6 Q. What was the -- well, first of all, where  
7 was the shop located, the garage?  
8 A. Just south of the welding shop.  
9 Q. How far was it from the dry mill?  
10 A. Three, 400 yards.  
11 Q. Was it dusty in the truck shop, in the  
12 garage?  
13 A. Not real bad, no.  
14 Q. Can you describe what kind of dust  
15 conditions you would see there or when you would  
16 see dust there?  
17 A. Well, most of the time if the sun was  
18 shining and you had the door open a little bit and  
19 you look out, you could see dust, you know,  
20 trickling down a little bit.  
21 Q. In the beam of light?  
22 A. Yeah, in the beam of light.  
23 Q. If there wasn't a beam of light, did you  
24 notice the dust?  
25 A. Probably not so much, no.

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- 1 to the dust in the garage the years you worked  
2 there?  
3 A. No comparison.  
4 Q. What do you mean by that?  
5 A. Well, in the welding shop, if you brought  
6 in a shovel bucket or something like that and an  
7 end loader bucket to repair and you turn them over  
8 with the crane in there, that metal that you put on  
9 to stop the wear traps all the ore and the dirt,  
10 and it got wore so thin, then you got to replace  
11 them, of course, and the bucket starts cracking and  
12 so forth. Then you got to chip that all out of  
13 there, and that creates a lot of dust.  
14 Q. You have to chip what out of there?  
15 A. The dirt.  
16 Q. What condition was the dirt that's in  
17 there?  
18 A. Very dry, hard and very dry just like as  
19 hard as a brick.  
20 Q. And how would you get that out?  
21 A. The chipping gun.  
22 Q. Can you tell us what a chipping gun is?  
23 A. It's an air-operated tool with a chisel  
24 like on it, and you just chip that dirt out of  
25 there so you can get to the clean metal.

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- 1 Q. And you worked there for two years?  
2 A. Yes.  
3 Q. And where did you go next?  
4 A. Three years.  
5 Q. Three years. I'm sorry. Okay. And then  
6 where did you go next?  
7 A. Welding shop.  
8 Q. And where is the welding shop located?  
9 A. Welding shop is north of the truck shop.  
10 Q. Okay. Is it near the dry mill again?  
11 A. No, not very close, probably about the  
12 same as the garage.  
13 Q. It's between the garage and the dry mill;  
14 is that right?  
15 A. Yes.  
16 Q. And Jack, did I show you Exhibit 124 and  
17 have you identify on there where the shop was?  
18 A. Yes.  
19 Q. And we did that this morning?  
20 A. Yes, uh-huh.  
21 Q. And on this computer image, this blue  
22 arrow, is that marking where the welding shop was?  
23 A. Yes.  
24 Q. Jack, how did the dust conditions in the  
25 welding shop in the years you worked there compare

Libby

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- 1 Q. Now, when you do that operation, did that  
2 create a lot of dust?  
3 A. Yeah, sometimes.  
4 Q. And was that the source of dust or the  
5 primary source of dust to your perception when you  
6 were in the welding shop?  
7 A. Yes.  
8 Q. How long did you work in the welding shop?  
9 A. Eleven years.  
10 Q. Jack, when did you first learn any of the  
11 names for the stuff that was in the dust?  
12 A. Probably in the late '70s.  
13 Q. And do you remember what you learned  
14 then? Do you remember those names?  
15 A. I think it was tremolite.  
16 Q. When you first heard the word tremolite in  
17 the late '70s, did you know what it was?  
18 A. No.  
19 Q. Did you know that it was a form of  
20 asbestos?  
21 A. No.  
22 Q. Did you know that tremolite could be  
23 harmful or even deadly at unsafe levels?  
24 A. No.  
25 Q. What did they tell you about the

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1 interrupt.	1 A. Open pit gold mine.
2 MR. McGARVEY: That's fine.	2 Q. And what did you do at those jobs?
3 A. Yes.	3 A. Mechanic.
4 Q. (By Mr. McGarvey) Did Grace ever notify	4 Q. Working on trucks?
5 you that you had been exposed to unsafe levels of	5 A. Yes.
6 asbestos?	6 Q. Are you still working at the mine in
7 A. No, I don't remember or recall them ever	7 Elko?
8 telling me that.	8 A. No, I'm not.
9 Q. Would it have been important to you to	9 Q. And when did you quit?
10 know that the government tests of the dust of the	10 A. About the middle of October.
11 levels at Grace while you worked there showed dust	11 Q. Just this past October 1999?
12 levels up to 10 to 100 times in excess of the safe	12 A. Yes.
13 limit?	13 Q. And why did you quit?
14 MR. MacDONALD: Objection.	14 A. Because of my cancer.
15 Speculation.	15 Q. Did you have any difficulties doing all
16 A. What was that again?	16 the requirements of your job up to a few weeks ago
17 Q. (By Mr. McGarvey) Would that have been	17 last October when you were diagnosed with the
18 something that would have been important to you to	18 cancer?
19 know?	19 A. None whatsoever.
20 A. Yes.	20 Q. Jack, what do you do during the day now?
21 Q. Jack, have you ever worked at any other	21 A. I sleep a lot and rest, just sit in a
22 mining operations?	22 chair and watch t.v., about it, not very exciting.
23 A. Yes.	23 Q. Can you describe any of the tasks that you
24 Q. Tell me about that.	24 do during the day that would illustrate the
25 A. I worked for ACM Company in the 1960s.	25 difficulties that you have getting through just
PAGE 26	PAGE 28
1 Q. Was that before you went to work at Grace?	1 normal tasks?
2 A. Yes.	2 A. Well, sometimes it's a struggle to get out
3 Q. And where was that?	3 of bed.
4 A. Butte, Montana.	4 Q. It is for all of us, Jack.
5 Q. And what kind of mine was that?	5 A. Just walking is painful. It hurts. I
6 A. Underground copper mine.	6 like to go outside and get some exercise, but I
7 Q. Jack, when you worked at the mine in	7 can't go outside if it's cold out, so I'm house
8 Butte, did you have to wear your work clothes	8 bound.
9 home?	9 Q. You told me this morning about brushing
10 A. No.	10 your teeth?
11 Q. Why not?	11 A. Yeah.
12 A. Because we had change room and showers.	12 Q. Tell me about that again.
13 Q. How about when you worked at Grace, did	13 A. Well, you got to sit on a chair to brush
14 they provide change rooms and showers so you didn't	14 your teeth.
15 have to bring your dusty clothes home?	15 Q. Why is that?
16 A. None whatsoever.	16 A. Because I have false teeth, and I can't
17 Q. Where else have you worked?	17 stand up long enough, bend over to brush them.
18 A. Boy, Round Mountain Gold.	18 Q. You just get too tired?
19 Q. When did you work there?	19 A. Yeah.
20 A. '88, '89.	20 Q. Are you tired now from the questions I've
21 Q. And was that a mining operation?	21 asked you?
22 A. Yes, it was open pit gold mine.	22 A. Yes.
23 Q. And where did you work after that?	23 Q. How old are you, Jack?
24 A. Barrick Gold Strike.	24 A. 59.
25 Q. And what kind of operation was that?	25 Q. Jack, what does this diagnosis of cancer